

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE**

JANE DOE, the student; by and through her)
Parents, K.M. and A.M.,)
)
Plaintiff,) No. 3:22-CV-63-KAC-DCP
)
v.)
)
KNOX COUNTY BOARD OF EDUCATION)
)
Defendant.)
)

PLAINTIFFS' MOTION TO SEAL AN EXHIBIT

COME THE PLAINTIFFS, filing this Motion to Seal and Exhibit. They show:

1. Plaintiffs timely filed their expert disclosures. (D.E. 77)
2. An attachment to one of those disclosures (the third attachment) is a record which contains identifying information involving the Plaintiff Jane Doe. While counsel of record should receive records in original form in order to verify identifying information (records are exchanged by counsel in unredacted form, and full names are used in depositions, but then redacted in the transcripts), the same is not true for the public *per se*. Identifying information of the Plaintiff, a minor with a disability, should be sealed.
3. Accordingly, Plaintiffs move to seal the attachment to the third exhibit, a letter from Dr. Jennifer Brout. (D.E. 77-3).

Respectfully submitted,

GILBERT LAW, PLLC

/s Justin S. Gilbert

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&

THE SALONUS FIRM, PLC

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CERTIFICATE OF SERVICE

I certify that this Motion to Seal was served upon all counsel of record for the Defendants, including Amanda Morse and Jessica Johnson, below, through the Court's ECF system on December 7, 2023.

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